EXHIBIT 2

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

CARLOS MARIN, KENNY LEBRON, and MARTINA HANISCH, on behalf of themselves and all others similarly situated, Plaintiffs, - against - APPLE METRO, INC., et al., Defendants.	Case No. 12 Civ. 5274 (ENV)(CLP) -related to-
SHAUNTA DOVE, on behalf of herself and all others similarly situated, Plaintiff, - against - APPLE METRO, INC., et al., Defendants.	Case No. 13 Civ. 1417 (ENV)(CLP)

NOTICE OF COLLECTIVE ACTION ~~LAWSUIT REGARDING WAGES~~LAWSUITS

If you worked at an ~~Apple Metro, Inc.~~ Applebee's Restaurant ~~between October 22, 2009 and the present in~~managed by Apple-Metro, Inc. in the boroughs of Manhattan,~~ The~~ Bronx, Brooklyn, Queens, or Staten Island, or in Westchester or Rockland ~~Counties,~~counties, please read this ~~*notice*~~Notice.

~~A~~Two collective action ~~**lawsuit**~~lawsuits may affect your legal rights.

~~***Important:***~~ You are ~~***NOT***~~not being sued. This Notice is ~~***NOT***~~not a solicitation from a lawyer. This Notice was authorized by the Court~~***to protect your rights***~~. Please read this Notice carefully.

- Plaintiffs Carlos Marin, Kenny Lebron, and Martina Hanisch~~, and Shaunta Dove~~ are ~~four~~three former employees of ~~the~~ Applebee's Restaurants ~~owned and operated~~managed by Apple-Metro, Inc. ("~~Applebee's" or "~~Defendants"). Plaintiffs Marin, Lebron and Hanisch worked as "non-managerial workers" (which includes servers, hosts, bartenders, cooks, expeditors, runners, dishwashers, and maintenance workers~~ ("non-managerial workers"~~). They have brought ~~this~~a lawsuit against Defendants on behalf of themselves and all other current and former similarly situated, non-managerial workers against Applebee's. Plaintiffs. These plaintiffs claim that Defendants unlawfully clocked them out while they were working, forced them to work off the clock, and did not allow them to clock in at the beginning of their scheduled shifts, and did not pay eligible workers.

- Separately, Plaintiff Shaunta Dove, who is a former host and server of an Applebee's Restaurant managed by Defendants, has brought a lawsuit against Defendants on behalf of herself and all other current and former similarly situated tipped employees. Plaintiff Dove claims that Defendants did not pay tipped hourly employees the tips owed to them from the tip pool. and enough in wages so that their hourly wage plus tips equaled the federal minimum wage.

- Defendants deny any wrongdoing and/or liability in both lawsuits and deny that any non-managerial workers were underpaid for his or her work at any time. maintain that all of their employees are paid in compliance with federal law.

- The Court has not decided whether anyone is owed any minimum wages or overtime, and theDefendants have violated federal law in either lawsuit. The Court is not endorsing the merits of this lawsuitthese lawsuits or advising you to participate in this lawsuitthese lawsuits.

Your legal rights may be affected, and you have a choice to make now:

YOUR LEGAL RIGHTS AND OPTIONS IN THISTHESE LAWSUITLAWSUITS	
ASK TO BE INCLUDEDJOIN	If you choose to be included in thisjoin either or both of these collective action lawsuits, you will be bound by any ruling, settlement or judgment in the case(s) you join. You will also share in any proceeds from a settlement or judgment if those bringing the lawsuits are successful, but you give up any rights to separately sue the Defendants about the same legal claims in this lawsuitthese lawsuits. If you wish to be includedjoin either or both collective action lawsuits, you must complete the formand submit the applicable Consent To Join forms at the end of this Notice.
DO NOTHING	By doing nothing, you will not be included in this lawsuit for the purpose of asserting a minimum wage or overtime claimthese lawsuits. This means that you give up the possibility of getting money or benefits that may come from a trial or settlement of the minimum wage or overtime claims asserted in this lawsuitthese lawsuits, if those bringing the lawsuitlawsuits are successful. Delay in joining this action may result in some or all of your potential claims expiring as a matter of law because the limitations period on your claims continues to run.

This notice contains information that affects your rights. Please read it carefully. To ask to be included in ~~this lawsuit~~these lawsuits, you must act before ~~______, 2014.~~[insert date that is sixty days from the date of mailing].

1. Why did I get this notice?

You are getting this notice because Defendants' records show that you may have worked as a "non-managerial worker" in ~~Defendants' Applebee's Restaurants. Two~~an Applebee's Restaurant managed by Apple-Metro, Inc. from May 27, 2011 to the present. Two collective action lawsuits have been brought against Defendants claiming they violated various provisions of federal ~~and New York State~~ wage and hour ~~laws. Defendants deny any and all of Plaintiffs' claims and deny any violations of any law, rule, or regulation. A trial may be necessary to decide whether the claims being made against Defendants are correct~~law.

The collective action lawsuits are known as *Marin, et al. v. Apple-Metro, Inc., et al.*, No. 12 Civ. 5274 (ENV)(CLP) ("*Marin* Lawsuit") and *Dove, et al. v. Apple-Metro, Inc., et al.*, No. 13 Civ. 1417 (ENV)(CLP) ("*Dove* Lawsuit"). The Honorable Eric N. Vitaliano, United States District Court Judge, and The Honorable Cheryl L. Pollak, United States Magistrate Judge, in the Eastern District of New York, are overseeing ~~these cases. The lawsuits are known as *Marin, et al. v. Apple-Metro, Inc., et al.*, No. 12 Civ. 5274 (ENV)(CLP) and *Dove, et al. v. Apple-Metro, Inc., et al.*, No. 13 Civ. 1417 (ENV)(CLP).~~ both cases.

~~**2. What is this lawsuit about?**~~

~~This lawsuit is about whether Defendants' compensation practices violate federal and/or New York law. The lawsuit alleges that Defendants violated federal and New York law by: (1) clocking out non-managerial workers while they were working; (2) forcing non-managerial workers to work off the clock; (3) failing to pay eligible non-managerial workers tips owed to them from the tip pool; and (4) not allowing non-managerial workers to clock in at the beginning of their scheduled shifts. Defendants deny these allegations.~~

~~3.~~2. What is a collective action lawsuit and who is involved?

In a collective action lawsuit, one or more persons ~~who have similar claims~~ can bring a lawsuit on behalf of others who have similar claims. All non-managerial workers~~,~~ (as described ~~in section~~on page 1 of this ~~notice,~~Notice) who decide to participate in ~~the case~~either or both of these cases by "opting in" to the ~~case~~cases, are conditionally part of the "Collective" or are "Collective Action Members." The individuals who brought ~~this~~a collective action lawsuit ~~– and all of the Collective Action Members –~~ are called the "Plaintiffs." The corporate entities and individuals that they have sued ~~– Apple-Metro, Inc. and the Applebee's restaurants it owns and operates –~~ are called the Defendants. ~~One Court~~The court resolves the issues for everyone who decides to join the ~~case~~cases.

3. What are these collective action lawsuits about?

These collective action lawsuits are about whether Defendants' compensation practices violate federal law. The *Marin* Lawsuit alleges that Defendants violated federal law by: (1) clocking out non-managerial workers while they were working; (2) forcing non-managerial workers to work off the clock; and (3) not allowing non-managerial workers to clock in at the beginning of their scheduled shifts. The *Dove* Lawsuit alleges that Defendants violated federal law by failing to pay tipped hourly employees (1) the tips owed to them from the tip pool; and (2) enough in wages so that their hourly wage plus tips equaled the federal minimum wage.

Defendants deny the allegations in both lawsuits.

4. What are the Plaintiffs asking for?

~~With respect to the federal claims to which this notice relates,~~ Plaintiffs in both lawsuits are seeking to recover unpaid wages (minimum wage and overtime pay), in addition to 100% (double) liquidated damages, ~~and~~ attorneys' fees, and costs.

5. Can I join ~~this lawsuit~~these collective action lawsuits?

To be eligible to participate in ~~this lawsuit~~the *Marin* Lawsuit, you must have worked as ~~a~~an hourly, non-managerial worker at one of ~~Apple-Metro, Inc.'s~~the Applebee's restaurants ~~in~~managed by Apple-Metro, Inc. in the boroughs of Manhattan, ~~The~~ Bronx, Brooklyn, Queens, or Staten Island, or in Westchester or Rockland ~~Counties~~counties, at any time from ~~October 22, 2009~~May 27, 2011 to the present.

To be eligible to participate in the *Dove* Lawsuit, you must have worked as a tipped employee (either as a server, bartender, host, or hostess) at one of the Applebee's restaurants managed by Apple-Metro, Inc. in the boroughs of Manhattan, Bronx, Brooklyn, Queens, or Staten Island, or in Westchester or Rockland counties, at any time from July 28, 2011 to the present. If you never worked as a tipped employee, you are not eligible to participate in the *Dove* Lawsuit.

If you have any questions, you may contact Plaintiffs' attorneys free of charge: Ariel Y. Graff or Robert W. Ottinger of The Ottinger Firm, P.C., 20 W. 55th Street, 6th Floor, New York, NY 10019, (212) 571-2000, ~~or Christopher L. Van De Water~~ or Michael J. Borelli of Borelli & Associates, P.L.L.C., 1010 Northern Boulevard Suite 238, Great Neck, NY ~~11201,~~11021, (516) 248-5550. Alternatively, you may contact Plaintiffs' attorneys by email through ApplebeesCase@ottingerlaw.com.

6. What happens if I do nothing at all?

By doing nothing, you will not be included in ~~this lawsuit~~these lawsuits for the purpose of asserting a minimum wage or overtime claim. This means that you give up the possibility of getting money or benefits that may come from a trial or settlement of the minimum wage or overtime claims asserted in ~~this lawsuit~~these lawsuits, if those bringing the ~~lawsuit~~lawsuits are successful. The limitations period on your claims continues to run. You can, however, initiate your own individual lawsuit against Defendants for minimum wage and overtime claims.

7. What happens if I join the ~~lawsuit~~collective action lawsuits?

If you do choose to join ~~the lawsuit you may do so by completing, signing, and returning the attached Consent to Join form in~~ one ~~of three ways: by (1) mail, (2) via .pdf submission e-mailed to ApplebeesCase@ottingerlaw.com, or (3) via facsimile to (212) 571-0505 by ______, 2014. With submission of the Consent to Join form~~one or both of these lawsuits, you will be bound by any ruling, settlement or judgment in the lawsuit(s) that you joined, whether favorable or unfavorable. You will also share in any proceeds from a settlement or judgment ~~favorable to the Collective. While this lawsuit is pending, you may be asked to testify and provide information about the work you performed for Defendants in order to help the Court decide whether you are owed any money. To join this lawsuit, you must submit the enclosed Consent to Join Form by ______, 2014.~~if those bringing the lawsuits are successful, but you give up any rights to separately sue the Defendants about the same legal claims in the lawsuit(s) that you joined.

While these lawsuits are pending, you may be required to respond to written question, testify at a deposition, and/or testify in court. If you do not comply with these requirements, your claims may be dismissed.

8. Can I ~~participate in this lawsuit~~join these collective action lawsuits even though, due to my immigration status, I am or was not working at Applebee's legally?

Your immigration status does not affect your entitlement to participate in ~~this~~either lawsuit.

9. Can Defendants retaliate against me if I join ~~the~~either lawsuit?

It is a violation of federal law for Defendants to fire, discipline, or in any manner discriminate or retaliate against you for taking part in ~~this case.~~either case. The filing of a consent form, however, will not affect your status as an at-will employee.

~~If you believe that you have been penalized, discriminated against, or disciplined in any way as a result of your receiving this notification, considering whether to join this lawsuit, discussing the lawsuit with others, or actually joining this lawsuit, you may contact Plaintiffs' lawyers or any other lawyers of your choosing. If any of the Defendants or their agents try to discuss the lawsuit with you, you have the right not to discuss it with them.~~

10. How do I ~~ask the Court to include me in the case~~join these collective action lawsuits?

Enclosed ~~is a form~~are two forms called "Consent to Join." The first is a Consent to Join form for the *Marin* Lawsuit. The second is a Consent to Join form for the *Dove* lawsuit.

If you choose to join ~~this lawsuit, it is extremely important that~~the *Marin* Lawsuit, you must read, sign, and promptly return the *Marin* Consent to Join form to Plaintiffs' attorneys. If you choose to join the *Dove* Lawsuit, you must read, sign, and promptly return the *Dove* Consent to Join form to Plaintiffs' attorneys. If you choose to join both the *Marin* and *Dove* Lawsuits, you must read, sign, and promptly return both the *Marin* and the *Dove* Consent to Join forms to Plaintiffs' attorneys.

An addressed and postage-paid envelope is enclosed for your convenience. Should the enclosed envelope be lost or misplaced, the Consent to Join ~~Form~~form(s) must be sent to:

The Ottinger Firm, P.C.
Re: Applebee's Case
20 West 55th Street, 6th Floor
New York, NY 10019
(212) 571-2000

You can also fax the Consent to Join form(s) to (212) 571-0505 or scan and email ~~it~~the form(s) to ApplebeesCase@ottingerlaw.com

The signed Consent to Join form(s) must be postmarked, faxed, or e-mailed by ~~________, 2014.~~[insert date that is 60 days from the date of mailing of the Notice]. If your signed Consent to Join form(s) is not postmarked, faxed, or e-mailed by ~~________, 2014,~~[insert date that is 60 days from the date of mailing of the Notice], you may not be allowed to participate in the federal law portion of ~~this lawsuit~~the lawsuits.

11. Do I have a lawyer in ~~this case~~these collective action lawsuits?

The Plaintiffs in ~~this lawsuit~~these lawsuits are represented by: Robert W. Ottinger, Ariel Y. Graff and other lawyers at The Ottinger Firm, P.C., ~~20 W. 55th Street, 6th Floor, New York, NY 10019 and Christopher L. Van De Water,~~and Michael J. Borelli and other lawyers at ~~the~~ Borelli & Associates, P.L.L.C.~~, 1010 Northern Boulevard Suite 238, Great Neck, NY 11201.~~ Their full contact information is listed in section 5 above.

If you wish, you may choose to be represented by Plaintiffs' counsel ~~in this case~~. You will not be required to pay any fee for services provided by The Ottinger Firm, P.C. and Borelli & Associates, P.L.L.C.

However, you also have the right to consult with an attorney of your own choosing about this matter, and ~~if you wish to~~ be represented by counsel other than Plaintiffs' counsel~~,~~. If you ~~may retain another attorney. You will be responsible for paying that attorney and that attorney must notify the Court of their representation.~~decide to retain your own attorney, you can agree on your own fee arrangement with him or her.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

CARLOS MARIN, KENNY LEBRON, and MARTINA HANISCH, on behalf of themselves and all others similarly situated,

Plaintiffs,

- against -

APPLE METRO, INC., et al.,

Defendants.

Case No. 12 Civ. 5274 (ENV)(CLP)

~~-related to-~~

~~Case No. 13 Civ. 1417 (ENV)(CLP)~~**CONSENT TO JOIN THE *MARIN* COLLECTIVE ACTION LAWSUIT**

~~SHAUNTA DOVE, on behalf of herself and all others similarly situated,~~

~~Plaintiff,~~

~~- against -~~

~~APPLE METRO, INC., et al.,~~

~~Defendants.~~

~~**CONSENT TO JOIN**~~

~~**COLLECTIVE ACTION LAWSUIT REGARDING WAGES**~~

~~IF YOU RECEIVED THIS FORM AND WANT TO JOIN THIS LAWSUIT, PLEASE COMPLETE THESE **TWO STEPS**:~~
If you received this form and want to join this lawsuit, please complete these two steps:

1. ~~COMPLETE AND SIGN THIS CONSENT TO JOIN LAWSUIT FORM; **AND**~~Complete and sign this consent to join lawsuit form; and

2. ~~USE THE ENCLOSED ENVELOPE TO RETURN THIS FORM TO THE ADDRESS BELOW **NOT LATER THAN** ____________~~.Use the enclosed envelope to return this form to the address below not later than [insert date that is 60 days from the mailing of the notice].

The Ottinger Firm, P.C.
Re: Applebee's Case
20 W. 55th ~~Street~~street, 6th Floor
New York, NY 10019

~~**YOU CAN ALSO FAX THE CONSENT TO JOIN FORM TO**~~You can also fax the consent to join form to (212) 571-0505,
~~**OR SCAN AND EMAIL IT TO: ApplebeesCase**~~or scan and email it to: applebeescase@ottingerlaw.com

* * * *

I consent to join the collective action(s) brought in the United States District Court for the Eastern District of New York titled *Marin, et al., v. Apple-Metro, Inc., et al.,* No. 12 Civ. 5274 (ENV)(CLP)~~ and/or *Dove, et al. v. Apple-Metro, Inc., et al.*, No. 13 Civ. 1417 (ENV)(CLP),~~ and authorize The Ottinger Firm, P.C and Borelli and Associates, P.L.L.C. to act on my behalf in all matters relating to this action, including any settlement of my claims.

SIGNATURE ____________________ PRINT NAME ____________________

Address ____________________ City, State, Zip Code ____________________

Telephone Number ____________________ Email Address ____________________

Restaurant Location(s) ____________________ Job Title(s) ____________________

Start Date ____________________ End Date ____________________

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SHAUNTA DOVE, on behalf of herself and all others similarly situated, Plaintiff, - against - APPLE METRO, INC., et al., Defendants.	Case No. 13 Civ. 1417 (ENV)(CLP) **CONSENT TO JOIN THE *DOVE* COLLECTIVE ACTION LAWSUIT**

If you received this form and want to join this lawsuit, please complete these two steps:

1. Complete and sign this consent to join lawsuit form; and

2. Use the enclosed envelope to return this form to the address below not later than [insert date that is 60 days from the mailing of the notice].

The Ottinger Firm, P.C.
Re: Applebee's Case
20 W. 55th street, 6th Floor
New York, NY 10019

You can also fax the consent to join form to (212) 571-0505,
or scan and email it to: applebeescase@ottingerlaw.com

* * * *

I consent to join the collective action(s) brought in the United States District Court for the Eastern District of New York titled *Dove, et al., v. Apple-Metro, Inc., et al.,* No. 13 Civ. 1417 (ENV)(CLP), and authorize The Ottinger Firm, P.C and Borelli and Associates, P.L.L.C. to act on my behalf in all matters relating to this action, including any settlement of my claims.

SIGNATURE	PRINT NAME
Address	City, State, Zip Code
Telephone Number	Email Address
Restaurant Location(s)	Job Title(s)
Start Date	End Date

Document comparison by Workshare Professional on Thursday, August 07, 2014 7:38:42 PM

Input:	
Document 1 ID	file://\\littler.com\dfs\userdata\nyo\clhogan\Documents\Apple-Metro\Ex Y - Pls.' Proposed Notice.docx
Description	Ex Y - Pls.' Proposed Notice
Document 2 ID	file://\\littler.com\dfs\userdata\nyo\clhogan\Documents\Apple-Metro\Proposed Final Notice.docx
Description	Proposed Final Notice
Rendering set	standard

Legend:	
Insertion	
~~Deletion~~	
~~Moved from~~	
Moved to	
Style change	
Format change	
~~Moved deletion~~	
Inserted cell	
Deleted cell	
Moved cell	
Split/Merged cell	
Padding cell	

Statistics:	
	Count
Insertions	159
Deletions	125
Moved from	9
Moved to	9
Style change	0
Format changed	0
Total changes	302